

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ALEXIA STIPA,

Plaintiff,

**V.**

THOMAS JEFFERSON UNIVERSITY,  
d/b/a THOMAS JEFFERSON  
UNIVERSITY HOSPITAL.

Defendant.

.....

Civil Action No. 24-CV-05431

## Jury Trial Demanded

## **Joint Status Report Pursuant to Rule 26(f)**

Pursuant to the Court's Pre-Trial Conference Order dated December 6, 2024, and in accordance with Rule 26(f), the parties, through their undersigned counsel, submit this Joint Status Report.

### Basis of Jurisdiction: Federal Question

Jury Trial Demanded. Arbitration: No.

Plaintiff's counsel participating in the Rule 16 Conference:

Rocco J. Iacullo

Defendants counsel participating in the Rule 16 Conference:

Michael A. Morse

Alexander M. Owens

Do counsel have full authority to settle at Rule 16 Conference? Yes.

When did the parties hold the Rule 26 Conference? December 12, 2024.

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure?

The parties will exchange Rule 26(a) disclosures by December 20, 2024, in accordance with this Court's Order.

Does either side expect to file a case-dispositive motion? Yes. Both parties.

If yes, under what Rule If yes, specify the issue: Rule 56 – Summary Judgment

Proposed deadline for filing dispositive motions: June 2, 2025

Does either side anticipate the use of experts?

The parties do not anticipate the use of experts at this time but reserve the right to employ experts if it is deemed necessary after further discovery.

Approximate date case should be trial-ready: September 2025.

Time for Plaintiff's case: 2 days.

Time for Defendant's case: 2 days.

Is a settlement conference likely to be helpful? Yes.

The parties have engaged in settlement discussions but believe that a settlement conference would be more successful after the parties at least have an opportunity to exchange written discovery.

Do the parties wish to proceed before a Magistrate Judge for final disposition? No.

**Plan for Discovery:**

1. The parties anticipate that discovery should be completed within 120 days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to?  
60 days.
3. Have the parties discussed issues relating to claims of privilege or of protection as trial preparation material, as required by Rule 26(f)(3)(D)?  
Yes.
4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders

needed, or other elements which should be included in a particularized discovery plan.

None at this time.

5. If you contend the discovery period to exceed 90 days, please state reason: The parties would like to ensure there is adequate time for the exchange of documents including additional time needed to obtain records and discovery from third parties, including but not limited to Plaintiff's medical records, records from CACREP, and any employment records.

6. Do the parties anticipate the need to subpoena any third parties?

Yes. See response to No. 5 above.

If yes, to the extent any authorizations or releases are required to be signed, counsel should exchange them in advance of the Rule 16 Conference.

The parties will work cooperatively to promptly provide and/or obtain any necessary authorizations or releases.

Respectfully submitted:

By: /s/ Rocco J. Iacullo  
Rocco J. Iacullo Esquire  
PA ID No. 86144  
Disability Rights Pennsylvania  
1800 John F. Kennedy Blvd.,  
Suite 900  
Philadelphia, PA 19103  
riacullo@disabilityrightspa.org  
(215) 583-8230

Attorney for Plaintiff

By: /s/ Michael A. Morse  
Michael A. Morse, Esquire  
PA ID No. 80507  
Pietragallo Gordon Alfano  
Bosick & Raspanti, LLP  
1818 Market Street, Suite 3402  
Philadelphia, PA 19103  
mam@pietragallo.com  
(215) 988-1427

Attorney for Defendant

Dated: December 16, 2024

**CERTIFICATE OF SERVICE**

I, Rocco Iacullo, hereby certify that the foregoing Joint Status Report Pursuant to Rule 26(f) was filed electronically with the Court electronic filing system (CM/ECF) on December 16, 2024, and made available for viewing onto:

Michael A. Morse, Esquire  
Alexander M. Owens, Esquire  
Pietragallo Gordon Alfano Bosick & Raspanti, LLP  
1818 Market Street, Suite 3402  
Philadelphia, PA 19103  
Office: 215-988-1427  
Fax: 215-754-5193  
[MAM@Pietragallo.com](mailto:MAM@Pietragallo.com)  
[Amo@pietragallo.com](mailto:Amo@pietragallo.com)

*Counsel for Defendant*

/s/ Rocco Iacullo  
Rocco Iacullo, Esquire